



## **PROGRESS REPORT NO. 190**

**TO:** Bonnie Arthur, U.S. Environmental Protection Agency (EPA) – via electronic mail  
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**Cc:** Kris McCaig, TAI – via electronic mail  
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**DATE:** May 5, 2022 **FILE NO:** 01-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study (RI/FS) –  
Progress Report No. 190, Month Ending April 2022

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Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES) – TAI submitted the draft interim data summary report (IDSR), which provides the data collected during the first year of field work completed for SATES Phases III and IV, as described in the associated work plan. This IDSR was submitted to EPA and the SATES team for review on March 29, 2022. TAI led a call on April 19, 2022 that was focused on a review of the data collected and preliminary analysis of the results obtained to date. Coordinated with and observed Confederated Tribes of the Colville Reservation History/Archaeology vegetation monitoring on the SATES test plots. As of this writing, TAI is preparing a statistical analysis summary for submittal to EPA in late May.

### **Baseline Ecological Risk Assessment (BERA)**

- TAI submitted the pre-draft terrestrial BERA (the Draft Interim Partial [IP] Upland BERA) to EPA on June 24, 2021 and received EPA's full set of draft comments on December 1, 2021. EPA provided final comments on the draft BERA to TAI on March 11, 2022. TAI submitted responses to EPA's comments on April 18, 2022. With that submittal, TAI requested expedited review and feedback from EPA on TAI's proposed resolution of certain comments so that TAI can start to address these revisions. As of this writing, TAI has scheduled a technical call with EPA on May 12 to discuss use of the enhanced vegetation index in the Upland BERA.

- TAI and EPA had a technical call on December 9, 2021 to review and discuss additional soil data sets that should be evaluated in the revised draft of the Upland BERA and draft Upland Remedial Investigation (RI) Report (see below), as well as EPA's comments indicating that additional sediment data should be collected from select upland lakes.
- TAI submitted, via email on March 3, 2022, an updated table summarizing the available soil data sets that meet criteria for use in the Upland BERA and a memorandum summarizing data attributes collected during EPA's soil removal action assessment in Northport in 2005, which verified sample locations and whether the data were collected from "improved" or "unimproved" locations to facilitate EPA's review and consideration of TAI's questions regarding soil data collected for the 2005 Northport removal action assessment. TAI and EPA discussed the revised soil data set on a technical call on March 9, 2022. As a result of this and subsequent discussions, TAI has received some, but not all, requested data verification and quality documentation from EPA for the Le Roi/Northport removal action assessment conducted by EPA in 2004 so that data from certain areas outside the Northport Exclusion Area may be considered for use in the Upland BERA.

Aquatic BERA – TAI received a letter from EPA on December 23, 2021 listing studies and data sets that should be evaluated for inclusion in the draft Aquatic BERA, and provided a draft data usability evaluation prepared by EPA. This letter is an update to a memorandum, dated August 23, 2017, EPA issued to TAI and includes EPA's evaluation of data sets developed since August 2017. TAI submitted comments on EPA's December 2021 letter and updated data sets on February 18, 2022. TAI and EPA had a technical call on March 23, 2022 on which TAI reviewed the data usability assessment (DUA) process that was applied to develop the data set used in the draft IP Upland BERA and that is described in Appendix B of that document, and which TAI plans to apply to the Aquatic BERA data set. On that call, EPA requested to see an updated aquatic data summary table similar to Table 4-1 in the draft IP Upland BERA. TAI agreed to provide the data summary to EPA when available. TAI received Sediment Transport Study Questions from EPA on April 29, 2022 and, as of this writing, is reviewing the questions in preparation for discussion with EPA in the near future.

RI Report – TAI received EPA's full set of draft comments on the pre-draft RI report (Draft IP Upland RI Report) via email on December 23, 2021. A call was held on January 31, 2022 to discuss some of EPA comments on the human health risk assessment summary provided in the IP Upland RI Report. Additional calls may be scheduled to discuss other technical and programmatic comments to advance resolution of comments. TAI submitted clarifying questions to EPA on February 4, 2022 and March 8, 2022. TAI received EPA's full set of final comments on April 1, 2022. TAI received responses from EPA on the two sets of clarifying questions on April 6, 2022.

#### 2019 Phase 3 Sediment Study:

- Draft Phase 3 Sediment Study Data Analyses Technical Memorandum – TAI received EPA's comments on the draft technical memorandum via email on March 4, 2022. TAI has reviewed the comments and identified comments and topics covering several

comments for discussion with EPA for further clarification and to help TAI identify a proposed resolution of those comments. Calls were held on April 6 and April 20, 2022 covered two sets of comments. TAI and EPA agreed to continue with technical calls in May and June to continue these discussions on other comments and/or topics in sequence.

- EPA Split Sample Reports

- Split Sediment and Porewater Chemistry Analyses, EPA Data Validation and Comparison Report – TAI received EPA's initial draft interlaboratory split sample comparison and evaluation memorandum via email on June 16, 2020. TAI reviewed the memo and provided comments to EPA on July 14, 2020. Subsequently, EPA requested, and TAI provided additional sample splits for analysis in accordance with EPA's Phase 3 Sediment Study Split Sample Chemistry Quality Assurance Project Plan Addendum that was finalized on September 21, 2020. EPA and TAI participated on a call on May 7, 2021, along with EPA's contract laboratory and TAI's contracted laboratory personnel, to discuss the results of the additional sediment sample analyses. On August 11, 2021, TAI received EPA's revised sediment and porewater split sample chemistry analyses data validation and comparison memo and EPA's response to comments. TAI submitted comments on the revised sample comparison memo for submittal to EPA on September 7, 2021. TAI is awaiting the revised draft interlaboratory split sample comparison and evaluation memorandum from EPA.
- Split Sample Bioassay Testing, EPA Data Verification and Validation Report for the U.S. Geological Survey Columbia Environmental Research Center (CERC) chemistry data – On March 31, 2021, TAI received EPA's Data Verification and Validation Report for the CERC porewater chemistry data for the 2019 Phase 3 sediment study bioassay split sample program. TAI provided comments to EPA on the data verification and validation report on April 23, 2021. TAI received EPA's second revision of the bioassay chemistry data verification and validation report on August 5, 2021 with EPA's responses to TAI's comments on the previous draft. TAI provided comments on this second revision of the data verification and validation report to EPA on August 19, 2021. TAI received the third revised draft bioassay chemistry data verification and validation report from EPA on January 31, 2022 and reviewed the revised report and EPA's responses to TAI comments and noted that supplemental comments TAI submitted to EPA on September 1, 2021 and October 19, 2021 have not been addressed. TAI provided a summary of those supplemental comments via email to EPA on February 22, 2022. Following discussion with EPA about the status of this data validation report on April 1, 2022, TAI submitted comments on the revised draft report, including the supplemental comments provided previously, to EPA on April 14, 2022.
- Split Sample Bioassay Testing, EPA Interlaboratory Split Sample Bioassay Comparison Memo – TAI received EPA's Interlaboratory Split Sample Bioassay Comparison Memo on June 21, 2021. TAI provided comments on this memo to EPA on July 30, 2021, and EPA provided a revised memo and responses to TAI comments

on October 5, 2021. TAI reviewed and provided comments on the revised memo and EPA responses to EPA on November 23, 2021 and is awaiting the revised draft split bioassay comparison memo from EPA.

Schedule Negotiations – During the month, TAI participated in two facilitated meetings (Teams calls) with EPA and a neutral facilitator, with a goal of developing an agreed schedule and sequence for TAI to complete the remaining major remedial investigation and feasibility study deliverables for the UCR site. To support these discussions and help visualize the path forward, TAI prepared a strawman schedule based on the schedule laid out in the RI/FS Work Plan and information discussed during the calls (e.g., estimated times for EPA review of draft documents) and prepared a strawman streamlined schedule for the BERA, RI, and FS deliverables focused on the aquatic system that were discussed on calls held in April. As of this writing, TAI is developing a strawman streamlined schedule for the Upland BERA, RI, and FS deliverables, that will reflect discussions on the same for the aquatic system. These calls are ongoing, with the next call scheduled for May 11.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.